

**UNITED STATES DISTRICT COURT
OF PUERTO RICO
CASE NO. 22-CR-00342-SCC-HRV**

UNITED STATES OF AMERICA,
Plaintiff,

v.

MARK T. ROSSINI,
Defendant.

_____ /

**MOTION TO RESTRICT AND IN COMPLIANCE WITH STANDING ORDER # 9 AND
LOCAL RULE 5.2**

Mark Rossini (“Mr. Rossini”), through undersigned counsel, and pursuant to Standing Order No. 9 of this Court and Local Rule 5.2, hereby moves to restrict access to his contemporaneously filed Motion to Dismiss and its accompanying exhibits. Mr. Rossini requests Your Honor allow the filing under the “Selected Parties” restriction level for the Court's, the government's, and counsel for co-defendants' review. This level of restriction is necessary, as it may contain information subject to protective orders issued in this case and personal data identifiers.

Mr. Rossini is also filing a redacted version of the Motion for public access in recognition of the presumption that federal proceedings remain open to the public. Additionally, given that much of the information is already publicly available and that these proceedings have progressed significantly, transparency is particularly appropriate at this stage. There are no overriding considerations that would justify restricting the redacted version of the

Motion, as openness is a fundamental principle in federal cases unless specific, compelling circumstances warrant otherwise.

WHEREFORE, Mr. Rossini respectfully requests that this Court grant this Motion to Restrict and allow the submission of the unredacted Motion to Dismiss under the “Selected Parties” restriction level, while allowing a redacted version to remain available to the public.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on September 26, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, causing a copy to be served on counsel of record.

/s/ Juan J. Michelen

Juan J. Michelen